

FILED

SEP - 8 2020

CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, )  
                                )  
                                Plaintiff, )  
                                )  
                               vs.              ) CRIMINAL NO. 20-CR-30133-NJR-01  
                                )  
                                )  
MARRIO D. ROBINSON,      )  
                                )  
                                Defendant. )

STIPULATION OF FACTS

Now comes, The United States of America, by Karelia S. Rajagopal, Assistant United States Attorney for the Southern District of Illinois, who enters into the following Stipulation of Facts with the Defendant, **MARRIO D. ROBINSON**, and his attorney, pertaining to the Defendant's relevant conduct, within the scope of U.S.S.G. §1B1.3. The parties hereby stipulate and agree as follows:

1. **MARRIO D. ROBINSON** maintained a long-term friendship with a man named TEREZE L. FENDERSON. On February 5, 2016 the Bureau of Alcohol, Tobacco, and Firearms (BATF) executed a search warrant at TEREZE L. FENDERSON'S residence and located pounds of marijuana along with a semi-automatic pistol. FENDERSON was indicted and later arrested on September 20, 2017. FENDERSON blamed T.R. for cooperating with law enforcement during the BATF investigation.

2. In the evening hours of October 21, 2017, FENDERSON called **MARRIO D. ROBINSON** and asked ROBINSON to accompany him while he travelled to areas of East St. Louis.

3. After midnight, in the early morning hours of October 22, 2017, T.R. was at a party Spanky's Lounge, located at 1434 Piggott Ave, East St Louis, Illinois. T.R. was standing outside

of the bar talking with a friend when FENDERSON pulled up driving a black Mazda CX-7 crossover SUV. **ROBINSON** was a passenger in FENDERSON's vehicle. FENDERSON did not try to enter the bar; rather he walked directly towards T.R. to confront him. T.R. backed up and walked into the street to get away from FENDERSON. A mutual friend interceded and engaged FENDERSON while T.R. tried to leave.

4. **ROBINSON** accompanied FENDERSON as he got out of the car to confront T.R. Neither FENDERSON nor **ROBINSON** attempted to enter the bar. Rather, after T.R. fled, they went directly back to the Mazda CX-7, with FENDERSON driving and **ROBINSON** getting into the back seat on the drivers' side. Individual #3 (initials D.N.) was in the front seat passenger's seat and remained in the vehicle during the confrontation. FENDERSON circled the block looking for T.R. Approximately two minutes later, they found T.R. hiding near the intersection of 15<sup>th</sup> and Piggott Streets. FENDERSON stopped the car in 15<sup>th</sup> Street and both FENDERSON and **ROBINSON** began shooting at T.R., striking him in the hip and lower leg. T.R. sought cover behind a vehicle parked nearby and returned fire three times from his own handgun, which caused FENDERSON to speed away.

5. T.R. was taken to a nearby hospital for treatment. The shot to T.R.'s lower leg broke both of the bones, requiring multiple surgeries to repair.

6. T.R. surrendered his firearm, which he lawfully owned while possessing an Illinois FOID card. That firearm was compared to shell casings found at the scene, which confirmed that T.R. fired three shots from the yard behind a parked car as he described.

7. Fourteen (14) spent shell casings, from two other two guns, were found in 15<sup>th</sup> Street, where T.R. said the Mazda CX-7 stopped to shoot. Four (4) of those shell casings were fired by FENDRESON from a 9 mm handgun, while ten (10) other casings were fired by

ROBSINSON from a Glock .40 caliber firearm.

8. The .40 caliber Glock firearm was manufactured outside of the State of Illinois and transported in interstate commerce.

9. At the time of this incident, Defendant knew that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year.

UNITED STATES OF AMERICA,

STEVEN D. WEINHOEFT  
United States Attorney

  
MARRIO D. ROBINSON  
Defendant

  
PATRICK KILGORE  
Attorney for Defendant

Date: 9/8/2020

  
KARELIA S. RAJAGOPAL  
United States Attorney

Date: Sept 8, 2020